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Attorneys for Claimant
CALEB BRADBERRY

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin
Gold (BTG), Bitcoin SV (BSV), and Bitcoin
Cash (BCH) seized from
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbh
x,

Defendant,

CALEB BRADBERRY,

Claimant.

CASE NO. CV 20-7811 RS

VERIFIED CLAIM IN ACCORDANCE
WITH TITLE 18 U.S.C. §983(a)(4)(A) Rule
C(6), SUPPLEMENTAL RULES FOR
CERTAIN ADMIRALTY AND
MARITIME CLAIMS

VERIFIED CLAIM

COMES NOW Claimant CALEB BRADBERRY, represented by attorneys Isaac Safier and Stephen P. New, and files this his Verified Claim, and represents that the following assertions are true and accurate to the best of his knowledge and belief:

1) I, CALEB BRADBERRY, am the original owner of 1000 Bitcoins now located at address 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx (herein “1HQ3”).

2) I am an assistant professor of Information Systems at Radford University.

i. I hold an undergraduate degree in Information Systems conferred in 2007 from Marshall University.

ii. I hold a Master of Business Administration degree, which I earned while working as a web developer for Kanawha County Schools in Charleston, West Virginia, and a Systems Administrator at PracticeLink in Hinton, West Virginia. I moved from Kanawha County Schools in October 2009 to PracticeLink, until April 2012 when the information technology department was outsourced.

iii. I hold a Doctor of Philosophy in Information Systems conferred in 2016 from the University of North Carolina at Greensboro, with dissertation titled: A Design Science Framework for Research In Health Analytics, <https://libres.uncg.edu/ir/uncg/listing.aspx?id=20931>

iv. I have a peer-reviewed publication in a regional conference, The Southeastern Chapter of the Institute for Operations Research in the Management Sciences (SEINFORMS), Bradberry, C., “An Examination of Blockchain’s Utility for Healthcare” - *Proceedings of the SEINFORMS*, 2018.

- v. I have been invited to a guest panel at SEINFORMS to discuss blockchain as it relates to business school curriculum, AI and the future of Business School Curriculum - SEINFORMS Panel Discussion, 2018
- vi. I have given an invited lecture at North Carolina Agriculture and Technical State University for their BlockChain Symposium on 9/26/2020, 4:00 pm – 4:45 pm “Teaching Blockchain” Dr. Caleb Bradberry of Radford University
- vii. I teach an introductory course for cybersecurity at Radford University, Data Privacy, Ethics, and Security:
<https://www.radford.edu/content/registrar/home/course-descriptions/csat-descriptions/information-technology/itec-145.html>
- viii. I teach Systems Analysis and Design, Introduction to Healthcare Informatics and HIPAA, Data Science 1, Decision Support Systems, and graduate level data science at Radford University.
- ix. I have taught Introduction to Web Programming at Radford University and UNC Greensboro.
- x. I have taught Introduction to Business Programming at UNC Greensboro.
- xi. I currently have a data use agreement with the National Institute of Health to perform machine learning on cancer data to improve cancer detection algorithms:
<https://cdas.cancer.gov/approved-projects/1788/>
- 3) I accumulated 1000 Bitcoins by participating in a mining pool in November 2009 to April 2010. I then placed 1000 bitcoins in a wallet at BTC-e.com in 14DvTTkwyE17cUVNPbB7KLHNuoAG8VHfds on 8/18/2011, verifiable via Bitcoin’s blockchain at block number 141,584. The website was subsequently hacked and my

1 bitcoins were moved to 1eqJNyyCKoNfefJrtb5dXLKAxDkqPVF3Y on 1/17/2012 then to
2 1BADznNF3W1gi47R65MQs754KB7zTaGuYZ on 4/9/2013 and ultimately to 1HQ3.

- 3 4) Any usage of my bitcoins after they were hacked and stolen from BTC-e.com was without
4 my consent or knowledge.
5
6 5) I am an innocent owner of 1000 Bitcoins currently located at 1HQ3. These 1000 Bitcoins
7 are not subject to forfeiture.
8
9 6) I hereby make my claim to 1000 of the Bitcoins in 1HQ3.
10
11 7) I am the claimant in this lawsuit.
12
13 8) I am a resident of Virginia.
14
15 9) The source of the seized property, Bitcoin mining, will be proven in court.

16 I, CALEB BRADBERRY, declare under the penalty of perjury that the forgoing representations are
17 true and accurate to the best of my knowledge and belief. I understand that a false statement or claim
18 may subject a person to prosecution under 18 U.S.C. 1001 and/or 1621 and is punishable by a fine
19 and up to five years imprisonment.

20 Dated 1/20/2021

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25 _____
26 CALEB BRADBERRY, CLAIMANT

27 Attorneys for Claimant CALEB BRADBERRY:
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2 Dated 1/21/2021



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8 Dated 01/21/2021



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